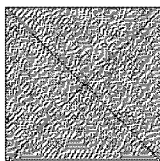


To: Chris Robertson[chris.robertson@lacity.org]
Cc: c13-allstaff[c13-allstaff@lacity.org]
From: Esmeralda Salguero
Sent: Wed 9/28/2016 9:19:08 PM
Subject: Re: Litigation Hold - Request for Records

I don't have any records related to the Wilcox Hotel Project.



Esmeralda Salguero

Council Aide/Special Assistant

Office of Councilmember Mitch O'Farrell, 13th District

1722 Sunset Blvd., Los Angeles, CA 90026

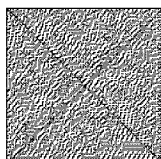
Phone (213) 207-3015 | Fax (213) 207-3031 | www.cd13.com

Find the Councilmember on:    

On Wed, Sep 28, 2016 at 1:04 PM, Chris Robertson <chris.robertson@lacity.org> wrote:

As a friendly reminder and follow-up, the **Petitioner has indicated that he will depose city employees about their efforts to search their personal files**, so doing this ought to avoid having to go through burdensome depositions. Please also be aware that **I will likely have to sign a declaration** that describes the efforts I made to collect documents from you.

Fun, fun!



Chris Robertson, AICP, LEED AP

Planning Director

Office of Councilmember Mitch O'Farrell, 13th District

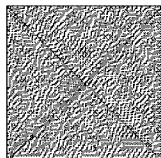
200 N. Spring Street, Room 480, Los Angeles, CA 90012

(213) 473-7013 w| (213) 265-6353 c| www.cd13.org



On Wed, Sep 28, 2016 at 12:57 PM, Chris Robertson <chris.robertson@lacity.org> wrote:

Thank you very much to those of you who have responded. Just a reminder that this request is due **today**. Again, this is for personal emails, personal files, and personal notes, including hand written notes **only** because ITA has already provided the search of our city emails. Thank you.



Chris Robertson, AICP, LEED AP

Planning Director

Office of Councilmember Mitch O'Farrell, 13th District

200 N. Spring Street, Room 480, Los Angeles, CA 90012



On Thu, Sep 22, 2016 at 5:00 PM, Chris Robertson <chris.robertson@lacity.org> wrote:

Team:

Please search all personal emails, files, and notes, including hand written notes, for documents related to the Wilcox Hotel Project (1541 Wilcox Blvd. / CPC-2014-3706-VZC-HD-ZAA-SPR / ENV-2014-3707). ITA has already provided all emails from the office. This project team included Michael Gonzalez, Laurie Goldman, Richard Heyman and Grant Young.

Records are due to me by
Wednesday, September 28.

Chris Robertson, AICP, LEED AP

Planning Director

Office of Councilmember Mitch O'Farrell, 13th District

200 N. Spring Street, Room 480, Los Angeles, CA 90012

(213) 473-7013 w| (213) 265-6353 c| www.cd13.org

----- Forwarded message -----

From: **Monica Castillo** <monica.castillo@lacity.org>

Date: Thu, Sep 22, 2016 at 3:11 PM

Subject: Re: Sunset Landmark Investment LLC v. City of LA - ATTORNEY-CLIENT PRIVILEGED
COMMUNICATION

To: Chris Robertson <chris.robertson@lacity.org>

Cc: Amy Ablakat <amy.ablakat@lacity.org>

ATTORNEY-CLIENT PRIVILEGED COMMUNICATION

Hi Chris,
The Silverstein firm is asking for "all emails, internal memoranda, notes, 'working files,' and all other documents from . . . the relevant Council District office(s). See attached letter.

We already conducted a search of records through ITA and produced city emails from CD 13, but Petitioner is insisting that CD 13 staff also search their personal emails, personal files, and personal notes, including hand written notes, that would not have been archived in the City's email system.

Can you please ask CD 13 staffers to search through their

personal emails, personal files, and personal notes, including hand written notes, for documents related to the Wilcox Hotel Project? The Councilmember's files and emails also need to be searched. If possible, I would like any documents that were located to be forwarded to me **by EOD**

Wednesday, September 28. It is also sufficient for staff to say they found nothing.

Petitioner has indicated that he will depose city employees about their efforts to search their personal files, so doing this ought to avoid having to go through burdensome depositions.

Please also be aware that you will likely have to sign a declaration that describes the efforts you made to collect documents from your staffers.

Happy to discuss any of the above if you have questions/concerns.

Thanks!
Monica

Monica D. Castillo
Deputy City Attorney
Land Use Division
Los Angeles City Attorney's Office
200 North Main Street, 7th Floor, MS 140
Los Angeles, California 90012
213.978.8068 (Office)
213.978.8214 (Fax)
monica.castillo@lacity.org

On Mon, Sep 19, 2016 at 1:20 PM, Chris Robertson <chris.robertson@lacity.org> wrote:

Hi Monica,

That would be me. What do you need and by when?

Chris Robertson, AICP, LEED AP
Planning Director
Office of Councilmember Mitch O'Farrell, 13th District
200 N. Spring Street, Room 480, Los Angeles, CA 90012
(213) 473-7013 w/ (213) 265-6353 c | www.cd13.org

On Mon, Sep 19, 2016 at 12:36 PM, Monica Castillo <monica.castillo@lacity.org> wrote:

Hi Chris and Amy,
We are defending a suit that challenges the approval of the Wilcox Hotel Project located at 1541 Wilcox Avenue, based on alleged CEQA violations, among other grounds.

This project is located in CD 13 and Petitioner is aggressively seeking documents related to the project.

Who is the best person to work with to ensure that we have all responsive documents from CD 13 staff, including the CM?

Thanks much,
Monica

Monica D. Castillo
Deputy City Attorney
Land Use Division
Los Angeles City Attorney's Office
200 North Main Street, 7th Floor, MS 140
Los Angeles, California 90012
213.978.8068 (Office)
213.978.8214 (Fax)
monica.castillo@lacity.org

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